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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Evaluate
the Mobilehome Park Pilot Program and
to Adopt Programmatic Modifications.

Rulemaking 18-04-018

**ADMINISTRATIVE LAW JUDGE'S RULING ENTERING MATERIALS INTO
THE RECORD AND SETTING A PREHEARING CONFERENCE**

Summary

This ruling enters presentations related to this proceeding that were made at the California Public Utilities Commission's (Commission) September 15, 2020 "Mobilehome Park Electrification Topics and Tenant Protections" Workshop into the proceeding record, and sets a schedule for initial activities related to issues within the scope of Phase 2. Parties may file comments on the workshop materials attached to this ruling and the questions contained in Section 2 below not later than October 19, 2020. Reply comments are due not later than October 26, 2020.

This ruling also sets a Prehearing Conference (PHC) for Phase 2 of this proceeding, which will be held on October 29, 2020, at 2:30 p.m. Phase 2 is expected to include exploration of electrification standards and tenant protections for the Mobile Home Park (MHP) Utility Conversion Program. Parties may suggest in their comments additional potential topics for Phase 2, including whether to develop a pilot for full electrification of MHPs, including existing mobile homes, for discussion at the PHC.

1. Workshop Presentation Materials

The following workshop presentation materials from the September 15, 2020, workshop, are attached to this ruling and are entered into the record of this proceeding.

- 1.1. Jeffrey Jenkins (SCE) “Southern California Edison (SCE) Electrification of MHPs”**
- 1.2. Ben Moffat (PG&E) “PG&E MHP Electrification”**
- 1.3. Nic Dunfee (TRC Solutions) “The Untapped Potential of the Manufactured Housing Market”**
- 1.4. Abigail Solis (Self-Help Enterprises) “Mobile Homes in San Joaquin Valley”**

Parties may file comments on these workshop presentation materials, which are also located on the Commission’s website at

<http://cpuc.ca.gov/mhpupgrade/>, not later than October 19, 2020.

2. Questions related to Phase 2 issues

As discussed at the September 15, 2020, workshop, two main issues expected to be within the scope of Phase 2 are electrification upgrade standards and tenant protections for the MHP Utility Conversion program. Parties are encouraged to file comments on the following questions related to those two issues. Comments shall be filed not later than October 19, 2020, and reply comments may be filed not later than October 26, 2020.

2.1. MHP Electric Service System

2.1.1. MHP Electric Service System Standards or Upgrades

- 1. Should this proceeding undertake further activities, such as formal testimony or workshops, to more fully understand the technical, legal, policy, and cost considerations with a MHP Utility Conversion program standard for 200 ampere to-the-meter electric service? If so, what types of information and activities are appropriate to provide a complete record on this issue?

2. Should the Commission adopt rules and standards for MHPs being rebuilt after a natural disaster? If so, please specify the rule or standard and provide rationale for why it should be adopted. Also, please address whether the recommended rule or standard should be addressed in this proceeding, or in a different proceeding such as Building Decarbonization (Rulemaking (R.) 19-01-011), Energy Efficiency (R.13-11-005), Energy Savings Assistance (Application (A.) 19-11-003, et al.), etc.? If a different proceeding, please specify.
3. Should the Commission consider adopting rules and standards for newly built MHPs in this proceeding, or should it be addressed in a different proceeding such as Building Decarbonization (R.19-01-011), Energy Efficiency (R.13-11-005), Energy Savings Assistance (A.19-11-003, et al.), etc.? If a different proceeding, please specify.

2.1.2. Possible MHP Pilot Program(s)

1. An electrification pilot in a MHP that is currently served by an electric master meter and propane could provide additional information on the technical, legal, policy and cost considerations for achieving full electrification of a MHP, including electrification of existing mobile homes. Should this proceeding consider adoption of an electrification pilot in such a MHP to gather this additional information? If yes:
 - a. How should the pilot be funded?
 - b. How should the pilot be structured?
 - c. How could a proposed MHP electrification pilot's selection criteria consider the potential impacts on environmental and social justice communities, including the extent to which a pilot may impact achievement of the goals of the Commission's Environmental and Social Justice Action Plan?
 - d. What other criteria should be considered?
 - e. By whom should the pilot be implemented?

2. Should any electrification pilot be coordinated with or deferred to other Commission proceedings, such as Building Decarbonization (R.19-01-011), Energy Efficiency (R.13-11-005), Energy Savings Assistance (A.19-11-003, et al.), etc.? If yes, please explain the appropriate venue and method for coordination or consideration of such a pilot.
3. Should any electrification pilot be coordinated with other California Agency energy programs such the federal Weatherization Assistance Program (WAP) or the Low-Income Weatherization Programs implemented by California Department of Community Services and Development (CSD)? Should a pilot be coordinated with the California Department of Housing and Community Development? If yes, how so?

2.2. Tenant Protections for MHP Residents

1. What data is available to inform the Commission's understanding of tenant protection issues in the MHP Utility Conversion Program, specifically issues related to excessive rent increases or evictions as a result of participation in the program? If such data does not exist, what methods can be used to gather it?
2. What tenant protection measures exist or can be implemented to prevent MHP owners from excessively raising rents or evicting tenants as a result of participating in the MHP Utility Conversion Program?
3. What aspects of tenant protection measures implemented in other Commission proceedings and by other California agencies may apply to the MHP Utility Conversion Program? Please consider the tenant protection approaches adopted by the Commission in the San Joaquin Valley Affordable Energy Pilots (R.15-03-010), and the Solar on Multifamily Affordable Housing Program (R.14-07-002). Please also consider the tenant protection approaches included in the federal WAP implemented by CSD.

4. What should be done to align tenant protections in the MHP Utility Conversion Program with existing local and state tenant protections and other relevant housing regulations?
5. If tenant protections become a requirement for participation in the MHP Utility Conversion Program, what terms should be included to prevent excessive rent increases or evictions for MHP tenants? How long should the tenant protections last?
6. What entity should be responsible for enforcement of tenant protections? What should the entity's ongoing enforcement responsibilities be? What penalties should exist for MHP owners who violate the tenant protections?
7. What is the appropriate vehicle to implement tenant protections in the MHP Utility Conversion Program? Should they be implemented using a standalone agreement, or should they be incorporated into the existing MHP Utility Conversion Program Agreement? Are there other vehicles that should be considered?

3. Next Steps

This ruling sets a telephonic PHC on October 29, 2020, commencing at 2:30 p.m., to discuss the scope, schedule, positions of the parties, and other procedural matters related to Phase 2 of this proceeding. The dial-in information is as follows:

Toll Free Number: 1-877-937-0696

Participant Code: 7032008

Please dial in at least 5 to 10 minutes before the start time of the PHC. Parties are directed to adhere to the following ground rules for telephonic participation:

- Speak only when addressed by the Administrative Law Judge
- Identify yourself before speaking

- Speak slowly and clearly
- Do not interrupt or speak over one another

All interested parties who intend to speak at the PHC are directed to email the name and title of the party representative no later than 5:00 p.m. on October 26, 2020, to the service list of R.18-04-018, with the following in the subject line of the email: "R.18-04-018 Party Representative for PHC."

If parties have prepared statements they intend to make during the PHC, please email them to the court reporter (reporting@cpuc.ca.gov) one day prior to, or on the day of, the PHC.

Parties desiring expedited transcripts should advise the Chief Hearing Reporter via e-mail at reporting@cpuc.ca.gov, no later than three days prior to the date of the PHC (October 26, 2020). As this is a telephonic PHC reliant on technology to relay statements in verbatim format by those in attendance to the court reporter, (1) the reporter will be interrupting the speakers when possible to do so without disrupting the proceeding, when there is/are inaudible statement(s) or portions thereof, and (2) the reporter will be inserting the word "inaudible" in the transcript when there is dropped, garbled, or otherwise indecipherable audio.

IT IS RULED that:

1. The September 15, 2020 "Mobilehome Park Electrification Topics and Tenant Protections" presentations located at <http://cpuc.ca.gov/mhpupgrade/> and attached to this ruling are entered into the record of this proceeding.
2. Parties may file comments on this ruling not later than October 19, 2020, with reply comments due on October 26, 2020. Party comments may cover both the workshop materials listed in Section 1 and the questions in Section 2 of this

ruling. Comments and replies may not exceed 20 pages, exclusive of attachments.

3. A telephonic Prehearing Conference in this proceeding will take place on October 29, 2020, commencing at 2:30 p.m. The dial-in information is as follows:

Toll Free Number: 1-877-937-0696

Participant Code: 7032008

4. All interested parties who intend to speak at the Prehearing Conference are directed to email the name and title of the party representative no later than 5:00 p.m. on October 26, 2020, to the service list of Rulemaking 18-04-018, with the following in the subject line of the email: "R.18-04-018 Party Representative for PHC."

Dated October 5, 2020, at San Francisco, California.

/s/ JESSICA T. HECHT

Jessica T. Hecht
Administrative Law Judge